

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

Hon. F. Dennis Saylor IV

**UNOPPOSED MOTION TO IMPOUND/SEAL DESIGNATED MATERIAL
IN PLAINTIFF’S OPPOSITION TO DEFENDANT’S
MOTION TO AMEND**

Pursuant to Local Rule 7.2 and the Order entering the Protective Order in this case (“Protective Order”), ECF No. 87, plaintiff Singular Computing LLC (“Singular”) respectfully requests the Court to impound and seal the unredacted copies of: (1) Singular’s Opposition to Defendant’s Motion to Amend (“Opposition”), and (2) Exhibits C and D to the supporting Declaration of Kevin Gannon. Singular is filing redacted public versions of the Opposition and Exhibits C and D concurrently herewith. Defendant Google LLC (“Google”) does not oppose this Motion to Impound/Seal.

Pursuant to the Protective Order entered in this case (Dkt. No. 87), the parties may designate documents and deposition transcripts as “Confidential” after making a good-faith determination that the documents and/or deposition transcripts contain information that is deemed “confidential, proprietary, and/or commercially sensitive information.” *Id.* at ¶¶ 6-7. Pursuant to paragraph 14 of the Protective Order, a party intending to file a document containing information deemed “Confidential” is required to file a motion to impound the unredacted version of the document. Singular’s Opposition and Exhibits C-D to the Declaration of Kevin Gannon contain information that has been designated as “Confidential” by Singular.

Submission of the unredacted versions of the Opposition and Exhibits C-D to the Declaration of Kevin Gannon is necessary to allow the Court to fully evaluate the issues raised in Google's Motion to Amend and Singular's Opposition. Accordingly, Singular requests the Court to grant this Motion to Impound the unredacted versions of the Opposition and Exhibits C-D to the Declaration of Kevon Gannon. Singular further requests that these unredacted documents remain impounded until further Order by the Court and that, upon expiration of the impoundment, the documents be returned to counsel for Singular.

Dated: July 8, 2022

Respectfully submitted,

/s/ Paul J. Hayes

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ATTORNEYS FOR THE PLAINTIFF

LOCAL RULE 7.1(a)(2) CERTIFICATION

I, Kevin Gannon, counsel for Singular Computing LLC, hereby certify that I conferred with counsel for Google LLC on July 7, 2022 and counsel for Google LLC indicated that Google LLC does not oppose the relief requested herein.

/s/ Kevin Gannon

CERTIFICATE OF SERVICE

I certify that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

/s/ Paul J. Hayes